

EXHIBIT A

TO *GRAZIOSO* PLAINTIFFS' PROPOSED CLERK'S CERTIFICATE OF DEFAULT

PLAINTIFFS' APPLICATION FOR CERTIFICATE OF DEFAULT

PURSUANT TO LOCAL CIVIL RULE 55.1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001 :

: : **APPLICATION FOR
CERTIFICATE OF
DEFAULT PURSUANT TO
LOCAL CIVIL RULE 55.1**
: :
: : **1:03 MDL 1570 (GBD)(SN)**
: :
-----X

This Document Relates to

Grazioso, et al. v. The Taliban, et al.

1:22-cv-01188 (GBD)(SN)

TO THE CLERK OF COURT:

NOW COME the *Grazioso* Plaintiffs, through counsel, and respectfully submit this Application for Certificate of Default Pursuant to Local Civil Rule 55.1. Plaintiffs rely on the Affidavit of Dennis G. Pantazis, Esquire, and exhibits thereto, filed contemporaneously herewith, in making this Application.

The *Grazioso* Plaintiffs seek a Certificate of Default against Defendant the Taliban.

Defendant the Taliban has failed to enter an appearance in this Court and has not filed any responsive pleading to the *Grazioso* Plaintiffs' Second Amended Complaint, or any other pleading filed by the *Grazioso* Plaintiffs.

Grazioso Defendant the Taliban has been afforded more than sixty (60) days to file responses, yet has not appeared in that time.

Pursuant to the Court's April 21, 2021 Order, service of the *Grazioso* pleadings and related materials on *Grazioso* Defendant the Taliban is now complete.

Respectfully submitted,

Date: November 8, 2023

/s/

Timothy B. Fleming (DC Bar No. 351114)
WIGGINS CHILDS PANTAZIS
FISHER GOLDFARB PLLC
2202 18th Street, NW, #110
Washington, D.C. 20009-1813
Washington, D.C. 20036
(202) 467-4489

Dennis G. Pantazis (AL Bar No. ASB-2216-A59D)
WIGGINS CHILDS PANTAZIS (*Lead Counsel*)
FISHER GOLDFARB LLC
The Kress Building
301 19th Street North
Birmingham, AL 35203
(205) 314-0500

Richard D. Hailey (IN Bar No. 7375-49)
Mary Beth Ramey (IN Bar No. 5876-49)
RAMEY & HAILEY
3905 Vincennes Road #303
Indianapolis, IN 46268
(317) 582-0000

Robert M. Foote (IL Bar No. 03124325)
FOOTE, MIELKE, CHAVEZ
& O'NEIL, LLC
10 West State Street, Suite 200
Geneva, IL 60134
(630) 232-7450

Attorneys for all of the Grazioso Plaintiffs